

RESPONSE TO MASTER INTERROGATORY 14:

See Preliminary Statement and General Objections.

Further objecting, this interrogatory is overly broad, unduly burdensome and not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without waiving objections:

- A. Dana will provide the information requested if the specific Victor product is identified.
- B. Dana states that generally, products with the prefix "Victor" are registered tradenames for Victor's products.
- C. Gaskets
- D. See response to Interrogatory 14(C) above.
- E. In sales to Original Equipment Manufacturers, the Victor Division will place that OEM's name on the package and/or gaskets. Victor does this for nearly all major OEM's (e.g., Ford, General Motors, etc.)
- F. See Preliminary Statement and General Objections. Further objecting, Dana objects to the extent this interrogatory seeks proprietary information. Subject to and without waiving objections, Dana states that certain Victor gaskets were composed of a combination of asbestos fibers (primarily chrysotile), steel, rubber and binding agents. Depending on the particular gasket, the asbestos content ranged from 0% to approximately 85%.
- G. Dana will provide information known to it if the specific Victor product is identified. Victor has been in business since 1909, and manufactures over 60,000 different types of gaskets.
- H. See response to 14(G) above.
- I. Victor Division of Dana maintains manufacturing sites at Chicago, Illinois and Robinson, Illinois.
- J. Dana will provide information known to it if the specific Victor product is identified. Victor manufactures over 60,000 different types of gaskets. See also attached depiction of a typical gasket.
- K. Subject to and without waiving objections, see response to 14(J) above.